

ESTTA Tracking number: **ESTTA648068**

Filing date: **01/03/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91218054
Party	Defendant Veeva Systems, Inc.
Correspondence Address	DAVID A W WONG BARNES & THORNBURG LLP 11 S MERIDIAN ST INDIANAPOLIS, IN 46204-3506 UNITED STATES dwong@btlaw.com
Submission	Answer
Filer's Name	Caitlin R. Brandon
Filer's e-mail	cbrandon@btlaw.com
Signature	/cbrandon/
Date	01/03/2015
Attachments	ANSWER Veeva v. Vector.pdf(71743 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

VECTOR SECURITY, INC. and	)	
VECTOR INTELLIGENT SOLUTIONS, LLC,	)	
dba Industry Retail Group	)	
	)	
Opposers,	)	
	)	
v.	)	
	)	Opposition No. 91218054
VEEVA SYSTEMS, INC.	)	Serial No. 85/939,929
	)	
Applicant	)	

**ANSWER TO NOTICE OF OPPOSITION**

Applicant Veeva Systems, Inc. ("Applicant") answers the Notice of Opposition as follows:

1. Applicant is without information sufficient to admit or deny the allegations of paragraph 1, and therefore denies the same.
2. Applicant is without sufficient information to admit or deny the allegations of paragraph 2, and therefore denies the same.
3. Applicant admits the allegations in paragraph 3.
4. Applicant admits the allegations in paragraph 4.
5. Applicant admits the allegations in paragraph 5.
6. Applicant admits that the records in the TTAB's electronic database and Opposer's Certificate of Services indicate that the Notice of Opposition was filed on August 27, 2014. Applicant is without sufficient information to admit or deny all other allegations in paragraph 6, and therefore denies the same.

7. Applicant admits that the USPTO records say what they say, but otherwise, is without sufficient information to admit or deny the allegations in paragraph 7, and therefore denies the same.
8. Applicant is without sufficient information to admit or deny the allegations of paragraph 8, and therefore denies the same.
9. Applicant is without sufficient information to admit or deny the allegations of paragraph 9, and therefore denies the same.
10. Applicant is without sufficient information to admit or deny the allegations of paragraph 10, and therefore denies the same.
11. Applicant is without sufficient information to admit or deny the allegations of paragraph 11, and therefore denies the same.
12. Applicant is without sufficient information to admit or deny the allegations of paragraph 12, and therefore denies the same.
13. Applicant admits that the USPTO records say what they say, but otherwise, is without sufficient information to admit or deny the allegations in paragraph 13, and therefore denies the same.
14. Applicant does not believe this paragraph requires a response. To the extent that it does, Applicant is without sufficient information to admit or deny the allegations of paragraph 14, and therefore denies the same.
15. Applicant is without sufficient information to admit or deny the allegations of paragraph 15, and therefore denies the same.
16. Denied.
17. Denied.

18. Applicant is without sufficient information to admit or deny the allegations of paragraph 18, and therefore denies the same.
19. Denied.

#### **AFFIRMATIVE DEFENSES**

1. Upon information and belief, Opposer's prayer for relief is barred by laches, waiver, and estoppel.
2. Upon information and belief, Opposer's prayer for relief is barred under the doctrine of unclean hands.
3. Upon information and belief, Opposer's prayer for relief is barred by Opposer's fraud on the United States Patent and Trademark Office in connection with the prosecution of the application set forth in paragraph 7 of the Notice of Opposition.
4. Upon information and belief, Opposer's prayer for relief is barred by Opposer's mistake in connection with the prosecution of the application set forth in paragraph 7 of the Notice of Opposition.
5. Upon information and belief, the claims set forth in Opposer's prayer for relief is barred in whole or in part because the federal application on which Opposer's claims are premised is invalid.

**WHEREFORE,** Applicant prays that Opposer's Notice of Opposition against Applicant's U.S. Application Serial No. 85/939,929 be dismissed with prejudice.

Date: January 3, 2015

Respectfully submitted,

Veeva Systems, Inc.

By: /s/ David A.W. Wong

David A.W. Wong

Caitlin R. Brandon

**BARNES & THORNBURG LLP**

11 South Meridian Street

Indianapolis, Indiana 46204

Attorneys for Applicant

317-236-1313

317-231-7433

[dwong@btlaw.com](mailto:dwong@btlaw.com); [cbrandon@btlaw.com](mailto:cbrandon@btlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of this Answer to Notice of Opposition has been served January 3, 2014 by electronic mail as agreed to by the parties, addressed to the Applicant's Attorney of Record:

Andrew Cornelius  
Andrew J. Cornelius PC  
305 Mt. Lebanon Blvd, Suite 205  
Pittsburgh, PA 15234  
acornelius@ajciplaw.com

\_\_\_\_\_/s/ Caitlin R. Brandon\_\_\_\_\_

Caitlin R. Brandon